



**HAWAII LODGING & TOURISM
ASSOCIATION**

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OFFICE OF GENERAL
COUNSEL

Office of the General Counsel
Attn: Mr. Joff S. Jordan
Federal Election Commission
Washington, D.C. 20463

RE: MUR 6607

Dear Mr. Jordan:

We are writing in response to a complaint filed by Tulsi Gabbard against Muliufi "Mufi" Hannemann, both candidates for the U.S. Congress from Hawaii's 2nd District.

The Hawaii Lodging & Tourism Association is a non-profit, statewide trade organization of lodging properties, lodging owners and management firms, suppliers, and related firms and individuals. It was founded in 1947, with an original membership of 16 hotels, to represent the interests of Hawaii's lodging industry. Today, the HLTA includes 156 lodging properties representing 48,000 rooms and more than 400 members in other membership categories. We have members on all major islands of the State of Hawaii (Hawaii, Kauai, Lanai, Maui, Molokai, and Oahu) and chapters grouped by the state's four county jurisdictions. The association's mission is to provide advocacy and education for the hospitality industry. It is a partner state association of the American Hotel & Lodging Association, the largest trade association of its kind in the world.

Mr. Hannemann was hired by the HLTA's board of directors as the president and CEO of the association beginning in January 2011 until his resignation, effective July 8, 2012. Mr. Hannemann was charged with accomplishing the goals of the board of directors; increasing membership; supporting our county chapters; representing the organization before state and county legislative bodies and executive agencies; serving as an advocate and spokesman for the lodging and visitor industries; communicating our mission and goals to the general public; and representing the HLTA at charitable functions and other events sponsored by the association.

Mr. Hannemann's duties and goals required that he travel frequently to each of the state's islands for a variety of purposes, including attending board meetings when they were convened on islands beyond Oahu, meeting with hotel executives and other members on HLTA goals and activities, communicating the industry's concerns to government leaders in counties other than Oahu's, increasing membership recruitment and retention, helping plan and participate in our Visitor Industry Charity Walks held on five islands, speaking to students and interested parties on the importance of tourism to Hawaii's economy, and serving as a public advocate for our industry in the community. These responsibilities, particularly involving his participation in HLTA board meetings,

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chapter development, and membership recruitment, required that he make frequent trips to other islands.

Candidate Gabbard has made a number of broad assumptions that are not supported by any facts. Among them is the allegation that Mr. Hannemann was "campaigning full-time for Congress and certainly not working the same number of hours for his employer," that it was "very unlikely he devoted the same amount of time to his employment or that he completed the normal amount of work required for his position." No evidence is provided to support either claim.

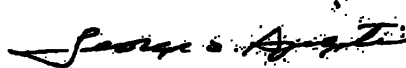
As far as the HLTA board of directors is concerned, Mr. Hannemann did an exceptional job as president and CEO throughout his 16-month tenure. He never failed to fulfill his responsibilities and worked tirelessly on HLTA business affairs, often late into the night and on weekends. We never once questioned his commitment to his job or the time he devoted to his duties—nor did we ever have a reason to do so.

Among his many successes, he reversed a trend of declining membership, was an articulate, energetic spokesman and advocate for the HLTA and visitor industry, accomplished the goals he and the board set to revitalize our county chapters, worked effectively with state legislators on bills affecting the industry, and helped organize the association's highly successful fundraising events to benefit local charities. Additionally, as the president and CEO, he represented the association on community activities such as the statewide Visitor Industry Charity Walk. He spoke on behalf of the HLTA before the local news media, and as the former mayor of the City and County of Honolulu, reporters often asked Mr. Hannemann for responses on issues associated with his time in public office.

We asked Mr. Hannemann to stay on until a successor could be named. He organized and led the search committee effort on behalf of the board of directors, and stayed until a candidate could be appointed and the transition completed.

We appreciate the opportunity to respond.

Sincerely,



George D. Szigeti
President & CEO

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